

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X

ALEJANDRO MANUEL ZAPATA OSORIO,
ATURO DEL RAZO, BRAULIO
ROLANDO CASHAMBAMBA CHANGO, ET AL.,
individually and on behalf of all others
similarly situated,

ANSWER

Plaintiffs,

Civ. Ac.19-CV-4896
(JH)(MST)

-against-

VECTOR STRUCTURAL PRESERVATION
CORP. (D/B/A VECTOR STRUCTURAL
PRESERVATION), NORTH STAR
STRATEGY. INC. (D/B/A NORTH STAR
STRATEGY), BILL HANDAKAS,
VASSILIOS HANDAKAS and SERGIO DOE,

Defendants,

-----X

Answering Defendants Vector Structural Preservation Corp. (d/b/a Vector Structural
Preservation), Bill Handakas and Vassilios Handakas, by their attorneys Rabinowitz, Galina and
Rosen, Esqs. as and for their Answer to the Collective Action Complaint states as follows:

1. Denies the allegations contained in paragraph “1” of the Complaint.
2. Admits that Defendant Vector Structural Preservation Corp. operates a construction
corporation contained in paragraph “2” of the Complaint and denies the other
allegations set forth in paragraph “2” of the Complaint. .
3. Admits that Defendant Vassilios Handakas is the principle of Defendant Vector
contained in paragraph “3” of the Complaint and denies the other allegations set forth in
paragraph “3” of the Complaint.
4. Denies the allegations contained in paragraph “4” of the Complaint.

5. Denies the allegations contained in paragraph “5” of the Complaint.
6. Denies the allegations contained in paragraph “6” of the Complaint.
7. Denies the allegations contained in paragraph “7” of the Complaint.
8. Denies the allegations contained in paragraph “8” of the Complaint.
9. Denies the allegations alleged in paragraph “9” of the Complaint.
10. Denies knowledge and information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph “10” of the Complaint. Defendants beg leave to refer to the cited statutes at trial.
11. Denies knowledge and information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph “11” of the Complaint. Defendants beg leave to refer to the cited statutes at trial.
12. Denies knowledge and information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph “12” of the Complaint. Defendants beg leave to refer to the cited statutes at trial.
13. Denies knowledge and information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph “13” of the Complaint. Defendants beg leave to refer to the cited statutes at trial.
14. Denies knowledge and information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph “14” of the Complaint.
15. Denies the allegations set forth in paragraph “15” of the Complaint.
16. Denies knowledge and information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph “16” of the Complaint.
17. Denies the allegations set forth in paragraph “17” of the Complaint.

18. Denies knowledge and information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph “18” of the Complaint.
19. Denies the allegations set forth in paragraph “19” of the Complaint.
20. Denies knowledge and information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph “20” of the Complaint.
21. Denies the allegations set forth in paragraph “21” of the Complaint.
22. Denies knowledge and information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph “22” of the Complaint.
23. Denies the allegations set forth in paragraph “23” of the Complaint.
24. Denies knowledge and information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph “24” of the Complaint.
25. Denies the allegations set forth in paragraph “25” of the Complaint.
26. Denies knowledge and information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph “26” of the Complaint.
27. Denies the allegations set forth in paragraph “27” of the Complaint.
28. Denies knowledge and information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph “28” of the Complaint.
29. Denies the allegations set forth in paragraph “29” of the Complaint.
30. Denies knowledge and information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph “30” of the Complaint.
31. Denies the allegations set forth in paragraph “31” of the Complaint.
32. Denies knowledge and information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph “32” of the Complaint.

33. Denies the allegations set forth in paragraph “33” of the Complaint.
34. Denies knowledge and information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph “34” of the Complaint.
35. Denies the allegations set forth in paragraph “35” of the Complaint.
36. Denies knowledge and information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph “36” of the Complaint.
37. Denies the allegations set forth in paragraph “37” of the Complaint.
38. Denies knowledge and information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph “38” of the Complaint.
39. Denies the allegations set forth in paragraph “39” of the Complaint.
40. Denies the allegations contained in paragraph “40” of the Complaint.
41. Admits the allegations contained in paragraph “41” of the Complaint.
42. Denies knowledge and information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph “42” of the Complaint.
43. Admits that Handakas is an owner of Defendant Vector only as set forth in paragraph “43” of the Complaint and denies all other allegations contained in paragraph “43” of the Complaint.
44. Denies the allegations contained in paragraph “44” of the Complaint.
45. Denies knowledge and information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph “45” of the Complaint.
46. Denies the allegations contained in paragraph “46” of the Complaint.
47. Denies the allegations contained in paragraph “47” of the Complaint.
48. Denies the allegations contained in paragraph “48” of the Complaint.

49. Denies the allegations contained in paragraph “49” of the Complaint.
50. Denies the allegations contained in paragraph “50” of the Complaint.
51. Denies the allegations contained in paragraph “51” of the Complaint.
52. Denies the allegations contained in paragraph “52” of the Complaint.
53. Denies the allegations contained in paragraph “53” of the Complaint.
54. Denies the allegations contained in paragraph “54” of the Complaint.
55. Denies the allegations contained in paragraph “55” of the Complaint.
56. Denies the allegations contained in paragraph “56” of the Complaint.
57. Denies the allegations contained in paragraph “57” of the Complaint.
58. Denies the allegations contained in paragraph “58” of the Complaint.
59. Denies the allegations contained in paragraph “59” of the Complaint.
60. Denies the allegations contained in paragraph “60” of the Complaint.
61. Denies the allegations contained in paragraph “61” of the Complaint.
62. Denies the allegations contained in paragraph “62” of the Complaint.
63. Denies the allegations contained in paragraph “63” of the Complaint.
64. Denies the allegations contained in paragraph “64” of the Complaint.
65. Denies the allegations contained in paragraph “65” of the Complaint.
66. Denies the allegations contained in paragraph “66” of the Complaint.
67. Denies the allegations contained in paragraph “67” of the Complaint.
68. Denies the allegations contained in paragraph “68” of the Complaint.
69. Denies the allegations contained in paragraph “69” of the Complaint.
70. Denies the allegations contained in paragraph “70” of the Complaint.
71. Denies the allegations contained in paragraph “71” of the Complaint.

72. Denies the allegations contained in paragraph “72” of the Complaint.
73. Denies the allegations contained in paragraph “73” of the Complaint.
74. Denies the allegations contained in paragraph “74” of the Complaint.
75. Denies the allegations contained in paragraph “75” of the Complaint.
76. Denies the allegations contained in paragraph “76” of the Complaint.
77. Denies the allegations contained in paragraph “77” of the Complaint.
78. Denies the allegations contained in paragraph “78” of the Complaint.
79. Denies the allegations contained in paragraph “79” of the Complaint.
80. Denies the allegations contained in paragraph “80” of the Complaint.
81. Denies the allegations contained in paragraph “81” of the Complaint.
82. Denies the allegations contained in paragraph “82” of the Complaint.
83. Denies the allegations contained in paragraph “83” of the Complaint.
84. Denies the allegations contained in paragraph “84” of the Complaint.
85. Denies the allegations contained in paragraph “85” of the Complaint.
86. Denies the allegations contained in paragraph “86” of the Complaint.
87. Denies the allegations contained in paragraph “87” of the Complaint.
88. Denies the allegations contained in paragraph “88” of the Complaint.
89. Denies the allegations contained in paragraph “89” of the Complaint.
90. Denies the allegations contained in paragraph “90” of the Complaint.
91. Denies the allegations contained in paragraph “91” of the Complaint.
92. Denies the allegations contained in paragraph “92” of the Complaint.
93. Denies the allegations contained in paragraph “93” of the Complaint.
94. Denies the allegations contained in paragraph “94” of the Complaint.

95. Denies the allegations contained in paragraph “95” of the Complaint.
96. Denies the allegations contained in paragraph “96” of the Complaint.
97. Denies the allegations contained in paragraph “97” of the Complaint.
98. Denies the allegations contained in paragraph “98” of the Complaint.
99. Denies the allegations contained in paragraph “99” of the Complaint.
100. Denies the allegations contained in paragraph “100” of the Complaint.
101. Denies the allegations contained in paragraph “101” of the Complaint.
102. Denies the allegations contained in paragraph “102” of the Complaint.
103. Denies the allegations contained in paragraph “103” of the Complaint.
104. Denies the allegations contained in paragraph “104” of the Complaint.
105. Denies the allegations contained in paragraph “105” of the Complaint.
106. Denies the allegations contained in paragraph “106” of the Complaint.
107. Denies the allegations contained in paragraph “107” of the Complaint.
108. Denies the allegations contained in paragraph “108” of the Complaint.
109. Denies the allegations contained in paragraph “109” of the Complaint.
110. Denies the allegations contained in paragraph “110” of the Complaint.
111. Denies the allegations contained in paragraph “111” of the Complaint.
112. Denies the allegations contained in paragraph “112” of the Complaint.
113. Denies the allegations contained in paragraph “113” of the Complaint.
114. Denies the allegations contained in paragraph “114” of the Complaint.
115. Denies the allegations contained in paragraph “115” of the Complaint.
116. Denies the allegations contained in paragraph “116” of the Complaint.
117. Denies the allegations contained in paragraph “117” of the Complaint.

118. Denies the allegations contained in paragraph “118” of the Complaint.
119. Denies the allegations contained in paragraph “119” of the Complaint.
120. Denies the allegations contained in paragraph “120” of the Complaint.
121. Denies the allegations contained in paragraph “121” of the Complaint.
122. Denies the allegations contained in paragraph “122” of the Complaint.
123. Denies the allegations contained in paragraph “123” of the Complaint.
124. Denies the allegations contained in paragraph “124” of the Complaint.
125. Denies the allegations contained in paragraph “125” of the Complaint.
126. Denies the allegations contained in paragraph “126” of the Complaint.
127. Denies the allegations contained in paragraph “127” of the Complaint.
128. Denies the allegations contained in paragraph “128” of the Complaint.
129. Denies the allegations contained in paragraph “129” of the Complaint.
130. Denies the allegations contained in paragraph “130” of the Complaint.
131. Denies the allegations contained in paragraph “131” of the Complaint.
132. Denies the allegations contained in paragraph “132” of the Complaint.
133. Denies the allegations contained in paragraph “133” of the Complaint.
134. Denies the allegations contained in paragraph “134” of the Complaint.
135. Denies the allegations contained in paragraph “135” of the Complaint.
136. Denies the allegations contained in paragraph “136” of the Complaint.
137. Denies the allegations contained in paragraph “137” of the Complaint.
138. Denies the allegations contained in paragraph “138” of the Complaint.
139. Denies the allegations contained in paragraph “139” of the Complaint.
140. Denies the allegations contained in paragraph “140” of the Complaint.

141. Denies the allegations contained in paragraph “141” of the Complaint.
142. Denies the allegations contained in paragraph “142” of the Complaint.
143. Denies the allegations contained in paragraph “143” of the Complaint.
144. Denies the allegations contained in paragraph “144” of the Complaint.
145. Denies the allegations contained in paragraph “145” of the Complaint.
146. Denies the allegations contained in paragraph “146” of the Complaint.
147. Denies the allegations contained in paragraph “147” of the Complaint.
148. Denies the allegations contained in paragraph “148” of the Complaint.
149. Denies the allegations contained in paragraph “149” of the Complaint.
150. Denies the allegations contained in paragraph “150” of the Complaint.
151. Denies the allegations contained in paragraph “151” of the Complaint.
152. Denies the allegations contained in paragraph “152” of the Complaint.
153. Denies the allegations contained in paragraph “153” of the Complaint.
154. Denies the allegations contained in paragraph “154” of the Complaint.
155. Denies the allegations contained in paragraph “155” of the Complaint.
156. Denies the allegations contained in paragraph “156” of the Complaint.
157. Denies the allegations contained in paragraph “157” of the Complaint.
158. Denies the allegations contained in paragraph “158” of the Complaint.
159. Denies the allegations contained in paragraph “159” of the Complaint.
160. Denies the allegations contained in paragraph “160” of the Complaint.
161. Denies the allegations contained in paragraph “161” of the Complaint.
162. Denies the allegations contained in paragraph “162” of the Complaint.
163. Denies the allegations contained in paragraph “163” of the Complaint.

- 164. Denies the allegations contained in paragraph “164” of the Complaint.
- 165. Denies the allegations contained in paragraph “165” of the Complaint.
- 166. Denies the allegations contained in paragraph “166” of the Complaint.
- 167. Denies the allegations contained in paragraph “167” of the Complaint.
- 168. Denies the allegations contained in paragraph “168” of the Complaint.
- 169. Denies the allegations contained in paragraph “169” of the Complaint.
- 170. Denies the allegations contained in paragraph “170” of the Complaint.
- 171. Denies the allegations contained in paragraph “171” of the Complaint.
- 172. Denies the allegations contained in paragraph “172” of the Complaint.
- 173. Denies the allegations contained in paragraph “173” of the Complaint.
- 174. Denies the allegations contained in paragraph “174” of the Complaint.
- 175. Denies the allegations contained in paragraph “175” of the Complaint.
- 176. Denies the allegations contained in paragraph “176” of the Complaint.
- 177. Denies the allegations contained in paragraph “177” of the Complaint.
- 178. Denies the allegations contained in paragraph “178” of the Complaint.
- 179. Denies the allegations contained in paragraph “179” of the Complaint.
- 180. Denies the allegations contained in paragraph “180” of the Complaint.
- 181. Denies the allegations contained in paragraph “181” of the Complaint.
- 182. Denies the allegations contained in paragraph “182” of the Complaint.
- 183. Denies the allegations contained in paragraph “183” of the Complaint.
- 184. Denies the allegations contained in paragraph “184” of the Complaint.
- 185. Denies the allegations contained in paragraph “185” of the Complaint.
- 186. Denies the allegations contained in paragraph “186” of the Complaint.

187. Denies the allegations contained in paragraph “187” of the Complaint.
188. Denies the allegations contained in paragraph “188” of the Complaint.
189. Denies the allegations contained in paragraph “189” of the Complaint.
190. Denies the allegations contained in paragraph “190” of the Complaint.
191. Denies the allegations contained in paragraph “191” of the Complaint.
192. Denies the allegations contained in paragraph “192” of the Complaint.
193. Denies the allegations contained in paragraph “193” of the Complaint.
194. Denies the allegations contained in paragraph “194” of the Complaint.
195. Denies the allegations contained in paragraph “195” of the Complaint.
196. Denies the allegations contained in paragraph “196” of the Complaint.
197. Denies the allegations contained in paragraph “197” of the Complaint.
198. Denies the allegations contained in paragraph “198” of the Complaint.
199. Denies the allegations contained in paragraph “199” of the Complaint.
200. Denies the allegations contained in paragraph “200” of the Complaint.
201. Denies the allegations contained in paragraph “201” of the Complaint.
202. Denies the allegations contained in paragraph “202” of the Complaint.
203. Denies the allegations contained in paragraph “203” of the Complaint.
204. Denies the allegations contained in paragraph “204” of the Complaint.
205. Denies the allegations contained in paragraph “205” of the Complaint.
206. Denies the allegations contained in paragraph “206” of the Complaint.
207. Denies the allegations contained in paragraph “207” of the Complaint.
208. Denies the allegations contained in paragraph “208” of the Complaint.
209. Denies the allegations contained in paragraph “209” of the Complaint.

- 210. Denies the allegations contained in paragraph “210” of the Complaint.
- 211. Denies the allegations contained in paragraph “211” of the Complaint.
- 212. Denies the allegations contained in paragraph “212” of the Complaint.
- 213. Denies the allegations contained in paragraph “213” of the Complaint.
- 214. Denies the allegations contained in paragraph “214” of the Complaint.
- 215. Denies the allegations contained in paragraph “215” of the Complaint.
- 216. Denies the allegations contained in paragraph “216” of the Complaint.
- 217. Denies the allegations contained in paragraph “217” of the Complaint.
- 218. Denies the allegations contained in paragraph “218” of the Complaint.
- 219. Denies the allegations contained in paragraph “219” of the Complaint.
- 220. Denies the allegations contained in paragraph “220” of the Complaint.
- 221. Denies the allegations contained in paragraph “221” of the Complaint.
- 222. Denies the allegations contained in paragraph “222” of the Complaint.
- 223. Denies the allegations contained in paragraph “223” of the Complaint.
- 224. Denies the allegations contained in paragraph “224” of the Complaint.
- 225. Denies the allegations contained in paragraph “225” of the Complaint.
- 226. Denies the allegations contained in paragraph “226” of the Complaint.
- 227. Denies the allegations contained in paragraph “227” of the Complaint.
- 228. Denies the allegations contained in paragraph “228” of the Complaint.
- 229. Denies the allegations contained in paragraph “229” of the Complaint.
- 230. Denies the allegations contained in paragraph “230” of the Complaint.
- 231. Denies the allegations contained in paragraph “231” of the Complaint.
- 232. Denies the allegations contained in paragraph “232” of the Complaint.

- 233. Denies the allegations contained in paragraph “233” of the Complaint.
- 234. Denies the allegations contained in paragraph “234” of the Complaint.
- 235. Denies the allegations contained in paragraph “235” of the Complaint.
- 236. Denies the allegations contained in paragraph “236” of the Complaint.
- 237. Denies the allegations contained in paragraph “237” of the Complaint.
- 238. Denies the allegations contained in paragraph “238” of the Complaint.
- 239. Denies the allegations contained in paragraph “239” of the Complaint.
- 240. Denies the allegations contained in paragraph “240” of the Complaint.
- 241. Denies the allegations contained in paragraph “241” of the Complaint.
- 242. Denies the allegations contained in paragraph “242” of the Complaint.
- 243. Denies the allegations contained in paragraph “243” of the Complaint.
- 244. Denies the allegations contained in paragraph “244” of the Complaint.
- 245. Denies the allegations contained in paragraph “245” of the Complaint.
- 246. Denies the allegations contained in paragraph “246” of the Complaint.
- 247. Denies the allegations contained in paragraph “247” of the Complaint.
- 248. Denies the allegations contained in paragraph “248” of the Complaint.
- 249. Denies the allegations contained in paragraph “249” of the Complaint.
- 250. Denies the allegations contained in paragraph “250” of the Complaint.
- 251. Denies the allegations contained in paragraph “251” of the Complaint.
- 252. Denies the allegations contained in paragraph “252” of the Complaint.
- 253. Denies the allegations contained in paragraph “253” of the Complaint.
- 254. Denies the allegations contained in paragraph “254” of the Complaint.
- 255. Denies the allegations contained in paragraph “255” of the Complaint.

- 256. Denies the allegations contained in paragraph “256” of the Complaint.
- 257. Denies the allegations contained in paragraph “257” of the Complaint.
- 258. Denies the allegations contained in paragraph “258” of the Complaint.
- 259. Denies the allegations contained in paragraph “259” of the Complaint.
- 260. Denies the allegations contained in paragraph “260” of the Complaint.
- 261. Denies the allegations contained in paragraph “261” of the Complaint.
- 262. Denies the allegations contained in paragraph “262” of the Complaint.
- 263. Denies the allegations contained in paragraph “263” of the Complaint.
- 264. Denies the allegations contained in paragraph “264” of the Complaint.
- 265. Denies the allegations contained in paragraph “265” of the Complaint.
- 266. Denies the allegations contained in paragraph “266” of the Complaint.
- 267. Denies the allegations contained in paragraph “267” of the Complaint.
- 268. Denies the allegations contained in paragraph “268” of the Complaint.
- 269. Denies the allegations contained in paragraph “269” of the Complaint.
- 270. Denies the allegations contained in paragraph “270” of the Complaint.
- 271. Denies the allegations contained in paragraph “271” of the Complaint.
- 272. Denies the allegations contained in paragraph “272” of the Complaint.
- 273. Denies the allegations contained in paragraph “273” of the Complaint.
- 274. Denies the allegations contained in paragraph “274” of the Complaint.
- 275. Denies the allegations contained in paragraph “275” of the Complaint.
- 276. Denies the allegations contained in paragraph “276” of the Complaint.
- 277. Denies the allegations contained in paragraph “277” of the Complaint.
- 278. Denies the allegations contained in paragraph “278” of the Complaint.

279. Denies the allegations contained in paragraph “279” of the Complaint.
280. Denies the allegations contained in paragraph “280” of the Complaint.
281. Denies the allegations contained in paragraph “281” of the Complaint.
282. Denies the allegations contained in paragraph “282” of the Complaint.
283. Denies the allegations contained in paragraph “283” of the Complaint.
284. Denies the allegations contained in paragraph “284” of the Complaint.
285. Denies the allegations contained in paragraph “285” of the Complaint.
286. Denies the allegations contained in paragraph “286” of the Complaint.
287. Denies the allegations contained in paragraph “287” of the Complaint.
288. Denies the allegations contained in paragraph “288” of the Complaint.
289. Denies the allegations contained in paragraph “289” of the Complaint.
290. Denies the allegations contained in paragraph “290” of the Complaint.

AS AND FOR A FIRST CAUSE OF ACTION

291. In response to paragraph “291” of the Complaint, the Answering Defendants herein repeat and reallege each and every answer to the allegations contained in paragraphs “1” through “290” of the Complaint with the same force and effect as if more fully set forth herein.
 292. Denies the allegations contained in paragraph “292” of the Complaint.
 293. Denies the allegations contained in paragraph “293” of the Complaint.
 294. Denies the allegations contained in paragraph “294” of the Complaint.
 295. Denies the allegations contained in paragraph “295” of the Complaint.
 296. Denies the allegations contained in paragraph “296” of the Complaint.
 297. Denies the allegations contained in paragraph “297” of the Complaint.

AS AND FOR A SECOND CAUSE OF ACTION

298. In response to paragraph "298" of the complaint, the Answering Defendants herein repeat and reallege each and every answer to the allegations contained in paragraphs "1" through "297" of the Complaint with the same force and effect as if more fully set forth herein.

299. Denies the allegations contained in paragraph "299" of the Complaint.

300. Denies the allegations contained in paragraph "300" of the Complaint.

301. Denies the allegations contained in paragraph "301" of the Complaint.

AS AND FOR A THIRD CAUSE OF ACTION

302. In response to paragraph "302" of the Complaint, the Answering Defendants herein repeat and reallege each and every answer to the allegations contained in paragraphs "1" through "301" of the Complaint with the same force and effect as if more fully set forth herein.

303. Denies the allegations contained in paragraph "303" of the Complaint.

304. Denies the allegations contained in paragraph "304" of the Complaint.

305. Denies the allegations contained in paragraph "305" of the Complaint.

306. Denies the allegations contained in paragraph "306" of the Complaint.

AS AND FOR A FOURTH CAUSE OF ACTION

307. In response to paragraph "307" of the Complaint, the Answering Defendants herein repeat and reallege each and every answer to the allegations contained in paragraphs "1" through "306" of the Complaint with the same force and effect as if more fully set forth herein.

308. Denies the allegations contained in paragraph "308" of the Complaint.

309. Denies the allegations contained in paragraph "309" of the Complaint.
310. Denies the allegations contained in paragraph "310" of the Complaint.

AS AND FOR A FIFTH CAUSE OF ACTION

311. In response to paragraph "311" of the Complaint, the Answering Defendants herein repeat and reallege each and every answer to the allegations contained in paragraphs "1" through "310" of the Complaint with the same force and effect as if more fully set forth herein.

312. Denies the allegations contained in paragraph "312" of the Complaint.
313. Denies the allegations contained in paragraph "313" of the Complaint.

AS AND FOR A SIXTH CAUSE OF ACTION

314. In response to paragraph "314" of the Complaint, the Answering Defendants herein repeat and reallege each and every answer to the allegations contained in paragraphs "1" through "313" of the Complaint with the same force and effect as if more fully set forth herein.

315. Denies the allegations contained in paragraph "315" of the Complaint.
316. Denies the allegations contained in paragraph "316" of the Complaint.

AS AND FOR A SEVENTH CAUSE OF ACTION

317. In response to paragraph "317" of the Complaint, the Answering Defendants herein repeat and reallege each and every answer to the allegations contained in paragraphs "1" through "316" of the Complaint with the same force and effect as if more fully set forth herein.

318. Denies the allegations contained in paragraph "318" of the Complaint.
319. Denies the allegations contained in paragraph "319" of the Complaint.

AS AND FOR A EIGHTH CAUSE OF ACTION

320. In response to paragraph “320” of the Complaint, the Answering Defendants herein repeat and reallege each and every answer to the allegations contained in paragraphs “1” through “319” of the Complaint with the same force and effect as if more fully set forth herein.

321. Denies the allegations contained in paragraph “321” of the Complaint.

322. Denies the allegations contained in paragraph “322” of the Complaint.

323. Denies the allegations contained in paragraph “323” of the Complaint.

324. Denies the allegations contained in paragraph “324” of the Complaint.

325. Denies the allegations contained in paragraph “325” of the Complaint.

AS AND FOR A NINTH CAUSE OF ACTION

326. In response to paragraph “326” of the Complaint, the Answering Defendants herein repeat and reallege each and every answer to the allegations contained in paragraphs “1” through “325” of the Complaint with the same force and effect as if more fully set forth herein.

327. Denies the allegations contained in paragraph “327” of the Complaint.

328. Denies the allegations contained in paragraph “328” of the Complaint.

329. The Answering Defendants specifically deny each and every allegation not previously answered herein.

AS AND FOR A FIRST AFFIRMATIVE DEFENSE

330. One or more Plaintiffs was a manager and/or supervisor and not an employee and thus not eligible for overtime.

AS AND FOR A SECOND AFFIRMATIVE DEFENSE

331. One or more of the Plaintiffs was not employed by any of the answering Defendants named herein.

WHEREFORE, the Answering Defendants herein respectfully request an Order dismissing the Complaint together with such other and further relief as to this court may seem just and proper.

Dated: Mineola, New York
October 11, 2019

RABINOWITZ, GALINA AND ROSEN, ESQS.
Attorneys for the Answering Defendants



By: Michael Rabinowitz, Esq. (MR-5654)
94 Willis Avenue
Mineola, New York, 11501
(516) 739-8222

To: Jesse Barton, Esq. (JB-)
Michael Faillace & Associates, P.C.
Attorneys for Plaintiffs
60 East 42nd Street
New York, New York 10165
(212) 317-1200